

EXHIBIT “A”

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1	
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Attorneys for PREIT Services, LLC, as agent for Cherry Hill Center LLC	
In re:	Case No. 25-14608 (JNP)
BISTRO AT CHERRY HILL,	Chapter 7
Debtor.	Hon. Jerrold N. Poslusny, Jr.
	Hearing Date: n/a

**STIPULATION BETWEEN ANDREW SKLAR, AS CHAPTER 7 TRUSTEE, AND
PREIT SERVICES, LLC, AS AGENT FOR CHERRY HILL CENTER LLC,
REJECTING NONRESIDENTIAL REAL PROPERTY LEASE AND FORBEARANCE
AGREEMENT PURSUANT TO 11 U.S.C §365 AND FEDERAL RULE
OF BANKRUPTCY PROCEDURE 6006 AND FOR RELATED RELIEF**

This Stipulation is entered into as of the 17th day of July, 2025 between Andrew Sklar (the “Trustee”), as Chapter 7 trustee of the above-captioned debtor (the “Debtor”), and PREIT Services, LLC, (“PREIT”), as agent for Cherry Hill Center LLC (the “Landlord”), by and through their respective undersigned representatives.

WHEREAS, on May 1, 2025, the Debtor filed a voluntary petition for reorganization pursuant to Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”); and

WHEREAS, PREIT is the agent for the Landlord, which is the owner of the Cherry Hill Mall located in Cherry Hill, New Jersey (the “Mall”); and

WHEREAS, on July 10, 2025 (the “Conversion Date”), this Court entered an order converting the Debtor’s Chapter 11 case to a case under Chapter 7 of the Bankruptcy Code; and

WHEREAS, the Trustee was thereafter appointed interim trustee of the Debtor's estate, has duly qualified and is presently so acting; and

WHEREAS, prior to the Conversion Date, the Debtor occupied premises at the Mall (the "Leasehold Premises") for the operation of a restaurant pursuant to (i) a nonresidential real estate lease (the "Lease") and (ii) a forbearance agreement (the "Forbearance Agreement" and, collectively with the Lease, the "Agreements"); and

WHEREAS, as of the Conversion Date, the Premises contained perishable and non-perishable food and beverage inventory (collectively, the "Inventory"); and

WHEREAS, in the exercise of his reasoned business judgment, the Trustee intends to abandon the Inventory pursuant to §554 of the Bankruptcy Code; and

WHEREAS, in the exercise of his reasoned business judgment, the Trustee has determined that the Agreements should be rejected in order to avoid the accrual of administrative expenses for his use and occupancy of the Leasehold Premises arising under §§ 365(d)(3) and/or 503 of the Bankruptcy Code and

WHEREAS, subject to the approval of this Court, the Trustee and PREIT have entered into this Stipulation to effectuate the foregoing transactions.

NOW, THEREFORE, the Trustee and PREIT, intending to be legally bound, hereby agree as follows, subject to the approval of this Stipulation by the Bankruptcy Court.

1. The Agreements be and hereby are rejected as of 11:59 p.m. (prevailing Eastern time) on July 31, 2025 pursuant to §365 (a) and (b) of the Bankruptcy Code.

2. The Landlord, through its agents and employees, be and hereby is authorized to dispose of any and all Inventory which, in the Landlord's reasonable discretion, poses a public health and safety risk if not otherwise disposed of promptly.

3. Except as specifically set forth herein, nothing contained in this Stipulation shall affect the parties' respective rights or claims under the Bankruptcy Code or applicable non-bankruptcy law.

4. Each person executing this Stipulation hereby represents that he has the requisite authority to enter into this Stipulation on behalf of the party for which he is so signing and to bind such party to the terms and provisions hereof.

KURTZMAN | STEADY, LLC

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